

[Submitting Counsel on Signature Page]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

No. 4:22-MD-3047

MDL No. 3047

This Document Relates to:

ALL ACTIONS

**ADMINISTRATIVE MOTION TO
CONSIDER WHETHER DEFENDANT
SNAP INC.'S MATERIALS SHOULD BE
SEALED (MASTER COMPLAINT)**

Under Civil Local Rules 7-11 and 79-5(f), and pursuant to the Stipulated Order Governing Sealing Procedures (ECF No. 132), Plaintiffs submit this administrative motion to consider whether Defendant Snap Inc.’s (hereinafter “Snap”) materials should be sealed, specifically materials included in Plaintiffs’ Master Complaint.

Plaintiffs' Master Complaint contains and refers to materials from Defendant Snap which Plaintiffs have agreed to treat as highly confidential until a protective order is entered by the Court and Defendant Snap has formally designated the materials under that protective order. The materials Plaintiffs have agreed to treat as highly confidential are identified in the following table:

Paragraph
174
450
453
468
486
542

ADMIN. MOT. TO CONSIDER WHETHER SNAP'S
MATERIALS SHOULD BE SEALED
Case no. 4:22-md-03047-YGR

1 Plaintiffs accordingly move to file those portions of the Master Complaint under seal.
2 Defendant Snap bears the burden of establishing that all of the referenced material is sealable.
3 Plaintiffs take no position at this time on whether any of the referenced material satisfy the
4 requirements for filing under seal.

5 As required by Civil Local Rule 79-5, Plaintiffs are filing redacted versions of the Master
6 Complaint on the public docket. An unredacted version attached to this motion under seal
7 contains highlighting to indicate where redactions are proposed.

8 Dated: February 14, 2023 Respectfully submitted,

/s/ Lexi J. Hazam
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Plaintiffs' Co-Lead Counsel

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on February 14, 2023, I electronically filed the foregoing document
3 with the Clerk of the Court using the CM/ECF system, which will automatically send notification
4 of the filing to all counsel of record.

5 By: /s/ Lexi J. Hazam

6 Lexi J. Hazam

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